

ROCKY FLATS ENVIRONMENTAL TECHNOLOGY SITE REGULATORY CONTACT RECORD

Date/Time: January 20, 2005

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Regulatory Contact: Edd Kray
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Agency: CDPHE

Purpose of Contact: Disposition of Area VI Survey unit 2

Discussion:

In accordance with the 776/777 DOP, Appendix I, the preparation of the facility for demolition is conducted in consultation with the CDPHE and is based on a series of decisions primarily related to maintaining releases to the environment and doses to the workers as low as reasonably achievable (ALARA). This contact record documents the activities that were conducted to prepare Area VI survey unit 2 for demolition. Survey unit 2 includes rooms 156, 157, 158, 159, 159A-C, and Dock 5.

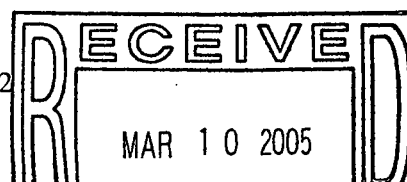
The preparation process for Survey unit 2 was initiated June 2, 2004 when a package for in-process radiological surveys was prepared and executed. Once the surveys were complete, the following actions were taken as part of the ALARA-based decontamination effort:

- Concrete shaving was performed on floor surfaces as necessary; manual chipping was used to remove hot spots.
- Expansion joints were remediated by manual chipping as necessary

The area was resurveyed in accordance with the Radiological Pre-Demolition Survey Plan for Buildings 776/777. The surveys were provided to the CDPHE project representative, and a walk down of the area was conducted.

In addition to the radiological hazards, the non-radiological hazards have also been addressed in Survey unit 2. The following summarizes the non-radiological activities:

- Room 159 was part of permitted RCRA container storage Unit 776.1. The floor was washed and rinsed, and the rinsate results obtained CDPHE concurrence, which was documented in a contact record dated November 15, 2004.
- Chemicals and hazardous substances have been removed.
- Beryllium regulated and controlled areas have been closed. None of the rooms in survey unit 2 were listed on the historical list of rooms with potential beryllium contamination. The baseline beryllium characterization and surveys following



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equipment removal found no removable beryllium contamination in these rooms. Prior to final encapsulation, eighteen (18) samples were collected in the survey unit on horizontal surfaces from floor to ceiling. All samples were below the analytical reporting limit of 0.1 ug/100 cm².

- Polychlorinated biphenyls (PCB) hazards and equipment have been removed.
- Asbestos has been abated, with the exception of asbestos in the soil in the concrete chase beneath the floor of Room 158 (see discussion below).

Based on the survey results and the principles of ALARA, the risks (industrial and radiological) to the workers are greater than the benefit in source term reduction that would be gained through additional decontamination. The state project representative agrees that decontamination inside survey unit 2 has progressed to the point of reasonably achievable removal and that the subsequent step of encapsulation is appropriate.

In summary, ALARA-based decontamination has been completed, Survey unit 2 will be encapsulated, surveyed for removable contamination, and controls applied during demolition. This contact record will be placed in the demolition file for this survey unit.

There is a concrete chase under room 158. The soil in this chase requires remediation for both radiological contamination and asbestos. The concrete over the chase will be painted orange to mark the area and ensure that the slab is not broken up until Environmental Remediation is ready to remove the soil. This area will also be annotated on building maps and discussed during the appropriate demolition pre-evolution briefings to ensure that the area is not disturbed.

Contact Record Prepared by: Carolyn Hicks

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